

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

Fond Du Lac Bumper Exchange, Inc., and Roberts
Wholesale Body Parts, Inc. on Behalf of Themselves
and Others Similarly Situated,

Plaintiffs,

v.

Jui Li Enterprise Company, Ltd., et al.,

Defendants.

Case No. 2:09-cv-00852-LA

**DIRECT PURCHASER PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR
FINAL APPROVAL OF TONG YANG AND GORDON SETTLEMENTS**

PLEASE TAKE NOTICE that Direct Purchaser Plaintiffs ("Plaintiffs") respectfully move this Court for an order: (i) granting final approval of settlements with Tong Yang Industry Co., Ltd., Taiwan Kai Yih Industrial Co., Ltd., TYG Products, L.P. (collectively, "Tong Yang Defendants") and Gordon Auto Body Parts Co. Ltd. ("Gordon Defendant") (collectively, "Settling Defendants"); (ii) affirming certification of a Settlement Class and appointment of Vincent J. Esades of Heins Mills & Olson, P.L.C. and Jason S. Hartley of Stueve Siegel Hanson, LLP as Co-Lead Settlement Class Counsel and K. Scott Wagner of Hale & Wagner, S.C. as Liaison Settlement Class Counsel; and appointment of Fond du Lac Bumper Exchange, Inc. and Roberts Wholesale Body Parts, Inc., as Class Representatives; and (iii) approving the Plan of Allocation for the settlement funds. This motion is based on the accompanying Direct Purchaser Plaintiffs' Memorandum of Law in Support of Motion for Final Approval of the Tong Yang and Gordon Settlements; Declaration of Carla A. Peak on Implementation and Overall Adequacy of Combined Settlement Notice Plan; Direct Purchaser Plaintiffs' memoranda and declarations filed

in support of Direct Purchaser Plaintiffs' motions for preliminary approval of the settlements and any accompanying exhibits (ECF Nos. 606-1, 607, 607-1 to 607-4, 608, 631, 632, 632-1 to 632-4, 633, 633-1 to 633-2); and on any evidentiary submissions that may be presented at hearing on this motion.

Dated: July 22, 2015

Respectfully submitted,

By: s/ Jessica Servais

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